



Region 4 State Parks
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**Environmental Assessment Decision Notice
For the First Peoples Buffalo Jump State Park Prairie Dog Management Plan
December 15, 2016**

Description of Proposed Action: Alternative B, the Adaptive Management Alternative, is MSP's preferred alternative. Under the Adaptive Management Alternative MSP would remove or reduce prairie dog populations where necessary to protect heritage resources. MSP would attempt to retain a healthy prairie dog population where they do not cause a significant adverse impact to heritage resources. MSP would monitor both prairie dogs and resource impacts in an attempt to learn how to best protect heritage resources while retaining prairie dogs.

MSP refers to this as the Adaptive Management Alternative because management would require a mix of efforts including; monitoring, learning, and new control efforts. Adaptive management treats management actions as experiments that have risk, yield data, and improve future decision making (Stankey et al., 2003). MSP seeks to learn how to retain prairie dog populations while protecting cultural resources.

Under the Adaptive Management Alternative MSP would divide First Peoples Buffalo Jump into two zones: the High Threat to Heritage Resources Zone and the Low Threat to Heritage Resources Zone (see Figure 9). In both zones MSP would manage prairie dogs to protect cultural, archeological, and heritage resources. The zones are differentiated, however, to identify the differing extent to which populations in the two zones are currently impacting known cultural, archeological, and heritage resources.

Public Process and Comments: A draft Environmental Assessment proposing this action was posted on November 1 2016, in the Public Notice section of the Montana State Parks website. A press release was sent out to the media on October 28. Public comment was accepted for a period of 21 days through November 21.

A total of 34 comments were received. Some comments addressed more than one alternative or category so the actual numbers of the summary will not add up to the total of 34.

The following is a breakdown of the comments.

For Alternative B - 5

For Alternative B/ No lethal control-1

For Alternative A – 16

For Alternative C- 0

Some comments did not address the actual alternatives but dealt with opposition to or in favor of using specific control measures.

For translocation- 2

For translocation/ Opposed to lethal controls-6

Opposed to lethal control-3

Comment period should be extended-1

Comments Specifically Addressed:

We are overstating prairie dog recovery with the statement, "*Prairie dogs appear to be rebounding....*" (p. 15)

Response: Prairie dogs appear to be rebounding from their lowest population nadir in the 1960's. This is not necessarily an overstatement.

Misleading statement, "*Montana's classification of prairie dogs as nongame wildlife lapsed and was not renewed, leaving them classified only as vertebrate pests (Mt FWP 2007)*" Prairie dogs remain on the Species of Concern list and a species of Greatest Conservation Need in the State Wildlife Action Plan

(SWAP) (P.13)

Response: They are still classified as non-vertebrate pests by the Department of Agriculture. *

Effects of Alt. B- No protocol/ surveys for non-target species / How would non-target species be protected? Protocols will vary dependent on controls. This information should be provided in an EIS.

Response: Protocols will vary depending on controls. Once we decide on treatments, we would ask the Wildlife Division to assist us with protocols for protecting non-target species.

Remove statement, "*protect public health, safety, and welfare; conserve natural processes and conditions....*" These goals are in 2005 Mgt plan but do not apply to this plan. (P.3)

Response: Should be kept in as this applies to visitor/ prairie dog interface.

Develop Alternative D- Present tools that could protect artifacts without lethal removal.

Response: The analysis in the EA has concluded that all reasonable alternatives were sufficiently considered. Our preferred alternative allows for the use of various non-lethal controls. Again, we would ask the Wildlife Division for assistance with any non-lethal controls including locating suitable release sites and funding as the process of translocation is very expensive.

Difficult to substantiate prairie dog damage because of previous history of disturbance at the park. Response: These disturbances occurred long before this site was a park. Since the establishment of the park minimal disturbances have occurred and only after cultural resource surveys of the affected area have been conducted. The damage done to resources by prairie dogs has occurred recently, and is within the Division's realm of management activities.

No compelling evidence for conflict between prairie dog activities and cultural and other heritage values. Can a case be made that this diminishes the experience of tribal members? Response: This is addressed in plan. These artifacts contribute to the sites integrity as a traditional cultural property and therefore contribute to the importance and use by various tribes.

Park should produce polling data to determine if visitors come mainly because of heritage component. We are underestimating the appeal of the colonies.

Response: We will leave and interpret the N4 colony so that visitors will still have the ability to view.

Reconfirm sighting of Mountain Plover with Richard Hopkins. No records of sightings in county.

Response: Removed from EA.

Change last sentence in Vegetation section to "*Accordingly, population reduction or removal may alter vegetation height and species composition, but these changes are not beyond the normal range of variation.*" (P.38)

Response: Change made in EA.

Typo- "Removal or prairie dogs may make dispersal to....." (P.39)

Use traditional native names throughout document ie; *Amskapi Pikuni* instead of *Blackfeet*

Response: Traditional names have been added.

The term gama grass is used throughout document without scientific name. Could be grama grass (*Boutelea*)? Please clarify.

Response: Clarified- Changed to Blue Grama

Section 1.5- Should include- Montana Human Skeletal remains and Burial Site Protection Act. Park contains native burial sites.

Response: Added.

Include SHPO in the 7.1 summary of EA development. Quote from letter cited.

Response: SHPO already cited in section 7.2

Add to references; Fisher, John W., and Tom Roll. 2016. First Peoples Buffalo Jump archeology: research results and public interpretation. In *Pisskan: Interpreting First Peoples bison kills at heritage parks*, edited by Leslie B Davis and John W. Fisher Jr. pp.87-108. University of Utah press, Salt Lake City.

Response: Added.

One comment recommended the need for an EIS.

Response: There is no precedent for the requirement of an EIS for prairie dog control. DNRC does not require an Environmental Assessment for controls on their property. Department of Agriculture employs an individual that assists people to control prairie dogs without the need for MEPA compliance. A number of federally managed sites have found that an EA is adequate to perform lethal controls including Badlands N.P. (2007), Devils Tower N.M. (2013), Wind Cave N.P. (2006), and Rocky Mountain Arsenal National Wildlife Refuge (2013) managed by the US Fish and Wildlife Service.

*** MCA-80-7-1101. Department to operate vertebrate pest management program.** The department may establish and operate organized and systematic programs for the management and suppression of vertebrate pests. Vertebrate pests are defined as jackrabbits, prairie dogs, ground squirrels, pocket gophers, rats, mice, skunks, raccoons, bats, and the following depredatory and nuisance birds: blackbirds, cowbirds, starlings, house sparrows, and feral pigeons, when they are injurious to agriculture, other industries, and the public. For this purpose, the department may enter into written agreements with appropriate federal agencies, other state agencies, counties, associations, corporations, or individuals covering the methods and procedures to be followed in the management and suppression of these vertebrate pests, the extent of supervision to be exercised by the department, and the use and expenditure of funds appropriated, when this cooperation is necessary to promote the management and suppression of vertebrate pests. Management is the correct identification of a vertebrate pest; recognition of its biology and environmental needs; assessment of the pest's damage,

Decision: Based on the Environmental Assessment and content of public comment, along with approval from the Parks and Recreation Board it is my decision to approve the proposed preferred Alternative B. I have determined that the proposed action would have no significant effects on the human or physical environment. Therefore, an environmental impact statement will not be prepared. By notification of this Decision Notice, the Draft Environmental Assessment (EA) is hereby made the Final EA.

This action is subject to appeal, which must be submitted to the FWP Director in writing and postmarked within 30 days of this decision notice. The appeal must specifically describe the basis for appeal, explain how the appellant has previously commented to the Department or participated in the decision-making process and how FWP might address the concerns of appeal.

John Taillie 1/25/17

John Taillie Region 4 Park Manager